

1
2 THE HONORABLE JAMES L. ROBART
3
4
5
6
7
8

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

9
10 ANNA PATRICK, DOUGLAS MORRILL,
ROSEANNE MORRILL, LEISA GARRETT,
ROBERT NIXON, SAMANTHA NIXON,
DAVID BOTTONFIELD, ROSEMARIE
BOTTONFIELD, TASHA RYAN, ROGELIO
VARGAS, MARILYN DEWEY, PETER
ROLLINS, RACHAEL ROLLINS, KATRINA
BENNY, SARA ERICKSON, GREG
LARSON, and JAMES KING, individually and
15 on behalf of all others similarly situated,

16 Plaintiffs,

17 v.

18 DAVID L. RAMSEY, III, individually; HAPPY
19 HOUR MEDIA GROUP, LLC, a Washington
limited liability company; THE LAMPO
20 GROUP, LLC, a Tennessee limited liability
company,

22 Defendants.

Case No. 2:23-cv-00630-JLR

**PLAINTIFFS' RESPONSE AND NON-
OPPOSITION TO DEFENDANTS
DAVID RAMSEY, III AND THE LAMPO
GROUP, LLC'S MOTION TO STAY
DISCOVERY AND ISSUANCE OF A
CASE SCHEDULE**

24 I. INTRODUCTION

25 Plaintiffs do not oppose the relief requested in Defendants David L. Ramsey, III and The
26 Lampo Group, LLC's Motion to Stay Discovery and Issuance of a Case Schedule. Defendants
27

1 have filed a Motion to Dismiss with a hearing date of September 15, 2023. A brief discovery
2 stay while the Defendants' Motion to Dismiss is pending is in the interest of judicial economy
3 and will help ensure that discovery is relevant to the case.

4
5
6
7 Dated this 17th day of August, 2023.
8
9
10
11
12

ALBERT LAW, PLLC

13 By: /s/ Gregory W. Albert
14 Gregory W. Albert, WSBA #42673
15 3131 Western Ave., Suite 410
16 Seattle, WA 98121
17 (206)576-8044
18 greg@albertlawpllc.com

19 And—
20
21

FRIEDMAN | RUBIN®

22 By: /s/ Roger S. Davidheiser
23 Roger S. Davidheiser, WSBA #18638
24 1109 First Ave., Ste. 501
25 Seattle, WA 98101
26 (206)501-4446
27 rdavidheiser@friedmanrubin.com
Attorneys for Plaintiffs